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## Comment on the Southern Forest Resource Assessment

One of the main goals of the Southern Forest Resource Assessment was to address the sustainability of the forest. Given that, it is difficult to find one location in the report that deals with the many aspects of this fundamental question, beginning with a definition. Is it the viability of biodiversity within the forest that is to be sustained? Is it a constant flow of sawlogs over hundreds of years without damage to the ecosystem? Where are data on how threatened, endangered, and sensitive species are faring? The various threats to sustainability are scattered (buried) all through this large report, but not coherently gathered together with conclusions and recommendations. A state by state breakdown of threats would be useful.

We are concerned with the quality of growth data that was used for Kentucky. There is an inventory currently in progress. The last one was completed in 1987. The growth for the 1987 inventory relies on information gathered in the 1970's. Thus, important data are over 20 years old and dates from a time when maximum growth was occurring as a result of the filling in after the overcutting that devastated Kentucky forests in the 20<sup>th</sup> century. In addition, mortality rates and cull factor have been documented as rising since 1987 in hardwood forests of surrounding states. Forest Inventory Analysis plots re-measured in West Virginia in 1996 showed that growth, after deducting for cull and mortality, was only 14% of historic growth rates in West Virginia. When was the last measurement and full report of Kentucky FIA plots done? By using old data from a time of maximum hardwood forest health and growth, and not accounting for increased cull factor and mortality, you are overestimating the growth rate of Kentucky hardwood forests. Also not calculated was the effect on hardwood growth from new wood product industries that use trees down to 4 inches in diameter. Your conclusion that Kentucky's hardwood forest growth will exceed harvest for 25 years is not documented or credible.

There are reports from across the state that the diameter of hardwood sawlogs continues to dwindle. Why is there no mention in this large report of the volume of marketable hardwood sawlogs in relation to harvest rate? At the curent billion bd. ft. or the SRTS projected two or three billion bd. ft. a year harvest rate the growth rate may stay stable for the next 25 years, but what is happening to the amount of marketable sawlogs? Our state's hardwood forest will be reduced to second growth shrubbery. What impact will this have on local sawmills and on the ecosystem? What market forces in the next twenty years will induce Kentucky's 260,000 privately owned forested landowners to harvest their trees at three times the current rate? Will there be a sustainable flow of hardwood sawlogs for the next twenty years, the next 100 years? To omit this kind of data from this study on sustainability is inexcusable, and your conclusion that hardwood growth will exceed harvest for 25 years, even if it is not overestimated, serves only to confuse the issue of sustainability.

Kentuckians for the Commonwealth supports the principles of ecology-based community forestry, and the principles of the Forest Stewardship Council.

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